

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**AMENDED NOTICE OF WITHDRAWAL AS TO CERTAIN CLAIMS SUBJECT TO
OMNIBUS OBJECTIONS (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF
PUERTO RICO, THE PUERTO RICO HIGHWAYS AND TRANSPORTATION
AUTHORITY, AND THE EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO²**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² On March 30, 2021, the Debtors, by and through the Oversight Board, filed the *Notice of Withdrawal as to Certain Claims Subject to Omnibus Objections (Non-Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico* [ECF No. 16260] (the "Notice of Withdrawal") withdrawing, without prejudice, the Debtors' objection to certain proofs of claim. As a result of a scrivener's error, two claims were inadvertently omitted from the Notice of Withdrawal. To resolve this issue, the Debtors respectfully submit this amended Notice of Withdrawal, which withdraws two additional claims from the Ninety-First Omnibus Objection and the One Hundred Thirty-Ninth Omnibus Objection.

To the Honorable United States District Judge Laura Taylor Swain:

1. Subject to notices of presentment filed October 20, 2020 are various objections to proofs of claim filed against the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and, together with the Commonwealth and HTA, the “Debtors”).

2. In light of additional information received since the filing of the notices of presentment, the Debtors, by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”) as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),³ respectfully withdraw, without prejudice, their objection to the following proofs of claim (the “Withdrawn Claims”):

- *Eighty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 8978]: Proofs of Claim Nos. 168144 and 168147.
- *Ninety-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 8980]: Proofs of Claim Nos. 39203, 37698, and 130049.
- *Ninety-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9548]: Proofs of Claim Nos. 47278, 34107, 24443, and 32304.

³ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

- *Ninety-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9549]: Proofs of Claim Nos. 11329, 32282, 7551, and 8867.
- *One Hundredth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9550]: Proofs of Claim Nos. 47960 and 29577.
- *One Hundred and Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9553]: Proofs of Claim Nos. 35232, 79162, 28809, and 92427.
- *One Hundred and Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9556]: Proofs of Claim Nos. 45398, 41103, and 39701.
- *One Hundred and Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9558]: Proofs of Claim Nos. 79250, 34072, 9333, 28069, and 18674.
- *One Hundred and Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 9559]: Proof of Claim No. 69079.
- *One Hundred Seventeenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 9567]: Proof of Claim No. 81539.

- *One Hundred Twentieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9570]: Proofs of Claim Nos. 2049, 4020, and 44439.
- *One Hundred Twenty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9894]: Proofs of Claim Nos. 129974 and 158493.
- *One Hundred Twenty-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9895]: Proof of Claim No. 114498.
- *One Hundred Twenty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9897]: Proofs of Claim Nos. 158322 and 115621.
- *One Hundred Twenty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9901]: Proofs of Claim Nos. 155387, 146784, 142658, and 151436.
- *One Hundred Thirtieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9903]: Proofs of Claim Nos. 140875, 113092, 145415, 120118, and 160275.
- *One Hundred Thirty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9905]: Proofs of

Claim Nos. 132181, 155203, 128275, 123152, 146930, and 143403.

- *One Hundred Thirty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9906]: Proofs of Claim Nos. 160125, 152030, and 159079.
- *One Hundred Thirty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based On Salary Demands, Employment or Services Provided* [ECF No. 9907]: Proofs of Claim Nos. 131576, 127854, 148168, and 111653.
- *One Hundred Thirty-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 9912]: Proofs of Claim Nos. 125652 and 132759.
- *One Hundred Thirty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 9921]: Proofs of Claim Nos. 165332 and 43794.
- *One Hundred Forty-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 9937]: Proofs of Claim Nos. 144085, 148952, and 149039.
- *One Hundred Forty-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 9941]: Proof of Claim No. 116045.
- *One Hundred Forty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the*

Commonwealth of Puerto Rico to Miscellaneous Deficient Claims [ECF No. 9942]: Proofs of Claim Nos. 137384 and 139353.

- *One Hundred Fifty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9944]: Proof of Claim No. 98826.
- *One Hundred Fifty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 9946]: Proofs of Claim Nos. 42106 and 93964.
- *One Hundred Sixty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 11824]: Proof of Claim No. 15949.
- *One Hundred Sixty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 11825]: Proof of Claim No. 5242.
- *One Hundred Sixty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 11833]: Proof of Claim No. 87277.
- *One Hundred Sixty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims* [ECF No. 11836]: Proof of Claim No. 99695.
- *One Hundred Seventy-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient and Late-Filed Claims* [ECF No. 12126]: Proof of Claim No. 168446.
- *Two Hundred Forty-Fifth Omnibus Objection (Non-Substantive) of the*

Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient and Late-Filed Claims
[ECF No. 14217]: Proof of Claim No. 170858

3. The Debtors reserve their rights to object to the Withdrawn Claims on any grounds whatsoever.

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Dated: March 31, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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